

**United States District Court
Southern District of Texas
Houston Division**

**Supplemental Civil Cover Sheet for Cases Removed
From State Court**

This form must be attached to the Civil Cover Sheet at the time the case is filed in the U.S. District Clerk's Office. Additional sheets may be used as necessary.

1. State Court Information:

Please identify the court from which the case is being removed and specify the number assigned to the case in that court.

<u>Court</u>	<u>Case Number</u>
334 th Judicial District Harris County, Texas	2019-19904

2. Style of the Case:

Jacolby Moore v. Fitness International, LLC

Please include all Plaintiff(s), Defendant(s), Intervenor(s), Counterclaimant(s), Crossclaimant(s) and Third Party Claimant(s) still remaining in the case and indicate their party type. Also, please list the attorney(s) of record for each party named and include their bar number, firm name, correct mailing address, and phone number (including area code.)

Party and Party Type

Plaintiff:

Jacolby Moore

Attorney(s):

Mr. Kenneth R. Baird
State Bar No. 24036172
Email: kbaird@bairdlawfirm.net

THE BAIRD LAW FIRM
2323 South Voss Road, Suite 325
Houston, Texas 77057
713/783-1113 (office)
281/677-4227 (telecopier)

Defendant:

Fitness International, LLC

Attorney(s):

Douglas D. Fletcher

State Bar No. 07139500

Email: doug.fletcher@fletcherfarley.com

Jeffrey D. Smith

State Bar No. 24063008

Email: jeffrey.smith@fletcherfarley.com

FLETCHER, FARLEY, SHIPMAN, SALINAS, L.L.P.

9201 N. Central Expressway, Suite 600

Dallas, Texas 75231

(214) 987-9600 (office)

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3. **Jury Demand:**

Was a Jury Demand made in State Court?

Yes

If "Yes," by which party and on what date?

Plaintiff
on March 19, 2019

4. **Answer:**

Was an Answer made in State Court?

Yes

If "Yes," by which party and on what date?

Defendant
On April 3, 2019

5. **Unserved Parties:**

The following parties have not been served at the time this case was removed:

Party

N/A

Reason(s) for No Service

6. **Nonsuited, Dismissed, or Terminated Parties:**

Please indicate any changes from the style on the State Court papers and the reason for that change:

Party

N/A

Reason

7. **Claims of the Parties:**

The filing party submits the following summary of the remaining claims of each party in this litigation:

Party

Plaintiff:

Jacolby Moore

Claim(s)

Plaintiff asserts personal injury claims against Defendant based on an alleged premises defect while Plaintiff was working as a lifeguard on December 9, 2018.

Defendant:

Fitness International, LLC

Defendant does not seek any affirmative relief.

Respectfully submitted,

**FLETCHER, FARLEY, SHIPMAN
& SALINAS, L.L.P.**

BY: /s/Douglas D. Fletcher
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**ATTORNEYS FOR DEFENDANT FITNESS
INTERNATIONAL, LLC d/b/a LA FITNESS**

CERTIFICATE OF SERVICE

I hereby certify that the foregoing instrument was electronically filed via the Court's CM/ECF system and a true and correct copy of same was delivered to all counsel of record in accordance with the FEDERAL RULES OF CIVIL PROCEDURE on this the 8th day of April 2019.

/s/Douglas D. Fletcher
DOUGLAS D. FLETCHER